

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Christopher P. Fields, Esq. (SBN 174155) LEE & FIELDS, APC 3731 Wilshire Blvd., Ste. 940 Los Angeles, CA 90010 Tel: (213) 380-5858 Fax: (213) 380-5860 chrisfields@leefieldslaw.com	FOR COURT USE ONLY
<input type="checkbox"/> <i>Individual appearing without attorney</i> <input checked="" type="checkbox"/> <i>Attorney for: Greg and Charlene Peale, Debtors</i>	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Gregory A. Peale and Charlene J. Peale, Debtor(s).	CASE NO.: 2:12-bk-41452 CHAPTER: 7 APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]

1. Movant applies under LBR 9075-1(b) for an order setting a hearing on shortened notice on the following motion:
 - a. Title of motion: Debtors' Ex Parte App to Reopen Ch 7 BK to Enlarge Time to File Motion to Vacate Judgment Liens
 - b. Date of filing of motion: 3/13/2013
2. Compliance with LBR 9075-1(b)(2)(A): (***The following three sections must be completed:***)
 - a. Briefly specify the relief requested in the motion:
Debtors request an emergency hearing in order to reopen their recently discharged chapter 7 bankruptcy in order to allow them the opportunity to file motions to vacate three judgment liens in the amounts of \$6,377.57, \$2,157.89 and \$3,788.52 totalling \$12,323.98.

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

b. Identify the parties affected by the relief requested in the motion:

Debtors, Greg and Charlene Peale. Judgment lien creditors, Capital One Bank (\$6,377.57), Attorney Collection Services, Inc.(\$2,157.89), and Professional Collection Consultants (\$3,788.52).

c. State the reasons necessitating a hearing on shortened time:

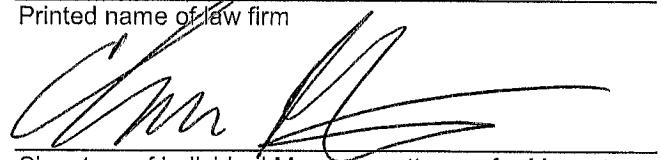
Debtors have lived in their family home for over 30 years, which home is scheduled to be sold in a trustee foreclosure sale on Friday, March 15, 2013 at 9:00 a.m. Debtors have engaged Liberty Home Equity Solutions who have approved the funding of a reverse mortgage loan ready to fund as soon as these liens are vacated. Debtors will lose approximately 50,000 to \$60,000 of equity in their home if sold in foreclosure, impairing their homestead equity claim.

3. Compliance with LBR 9075-1(b)(2)(B): The attached declaration(s) justifies setting a hearing on shortened notice, and establishes a *prima facie* basis for the granting of the motion.
4. Movant has lodged a proposed Order Setting Hearing on Shortened Notice on mandatory form F 9075-1.1.ORDER.SHORT.NOTICE

Date: 3/13/2013

Lee & Fields, APC

Printed name of law firm



Signature of individual Movant or attorney for Movant

Christopher P. Fields, Esq

Printed name of individual Movant or attorney for Movant